

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN**

SCOTT SEDORE, #210661

Plaintiff,

Case No.: 2:22-cv-10060
District Judge Gershwin A. Drain

v.

LANDFAIR, *et al.*

Defendants,

LIGHTHOUSE LITIGATION, PLLC
Joshua S. Goodrich, J.D., LL.M. (P83197)
Attorneys for Plaintiff
5208 W. Saginaw Hwy.
Lansing, MI 48917
(269) 312-7435
jsgoodrich@lighthouse-litigation.com

HACKNEY ODLUM & DARDAS
Thomas G. Hackney (P81283)
Connor A. McLaughlin (P83229)
Attorneys for Victoria Hallet, DO
10850 E. Traverse Hwy, Ste 4440
Traverse City, MI 49684
(231) 642-5026
thackney@hodlawyers.com
cmclaughlin@hodlawyers.com

MI DEPT. OF ATTORNEY GENERAL
OG Reasons (P80463)
Attorneys for the MDOC Defendants
PO Box 30217
Lansing, MI 48909
(517) 335-3055
reasonso@michigan.gov

DEFENDANT VICTORIA HALLET, DO'S
PROPOSED VOIR DIRE QUESTIONS

1. Are there any circumstances or obligations in your life that will prevent you from giving your full attention to this case?
2. Do you own or rent your home?

3. Level of education – how far did you go in school?
4. Your current occupation, name of employer, and number of years employed there?
5. What other jobs have you had during your working life?
6. If married describe your spouse's occupation, employer, and number of years worked there.
7. Have you or anyone you know experienced a situation where they were accused of wrongdoing for simply doing your/their job?
8. Tell us about the most difficult situation you were ever in where someone accused you of doing something bad that you did not do?
9. Tell us about the most difficult situation you were ever in where someone accused your actions of being motivated by revenge or retaliation when that was not the case.
10. Any television programs or podcasts that you watch or listen to regularly?
11. Describe your hobbies outside of work.
12. List any civic groups or organizations to which you belong?
13. Have you ever been involved in a lawsuit as a plaintiff or defendant, i.e. have you sued someone or ever been sued?

14. Have you, or any relatives or close friends, been employed as a police officer or worked for law enforcement agency or security business?
15. Have you, or any relatives or close friends, been the victim of a crime?
16. Have you, or any relatives or close friends, been employed in the medical field? If yes, please describe the nature of that employment?
17. Do you have any knowledge or understanding of the roles, duties, and division of labor in prisons between medical personnel, such as doctors and nurses who care for the prisoners, and other prison personnel such as security officers, administrators, wardens, etc.?
18. Tell us about the worst encounter you or anyone close to you has had with a law enforcement officer.
19. Do you believe that doctors or nurses should use their best medical judgment when making decisions regarding the treatment of their patients, even if the patients disagree with the course of treatment?
20. Have you ever had a situation where a patient – either you or someone you know – refused to follow a doctor’s advice or recommendation?
21. Do any of you hold any opinions about medical providers—such as doctors or nurses—that would prevent you from fairly considering and deciding this case solely on the evidence?

22. Do any of you harbor ill feelings against doctors?
23. Do any of you harbor ill feelings against prison medicine providers?
24. Do any of you feel like doctors or other medical providers that work in a prison are worse at their job or not otherwise as qualified as medical providers at hospitals or private practice?
25. Will you be able to follow the Court's instructions on the law, even if you disagree with them?
26. Will you be able to suspend judgment in this case until you have heard all of the evidence in this case, from both the Plaintiff's side and the defendant's side?

Submitted by:

HACKNEY ODLUM & DARDAS



Dated: March 13, 2025

By: _____
Thomas G. Hackney (P81283)
Connor A. McLaughlin (P83229)
Attorneys for Victoria Hallet, DO

CERTIFICATE OF SERVICE (E-FILE)

I hereby certify that on the 13th day of March, 2025, I electronically filed Defendant Victoria Hallet, DO's Proposed Voire Dire Questions together with this Certificate of Service with the Clerk of the Court and all counsel of record using the ECF system.

A handwritten signature in blue ink, appearing to read 'THS', is positioned above the signature line.

Dated: March 13, 2025

By: _____

Thomas G. Hackney (P81283)

Hackney Odum & Dardas

Attorneys for Victoria Hallet, DO